

1 David Chami
2 Price Law Group, P.C.
3 8245 N. 85th Way
4 Scottsdale, AZ 85258
5 Tel: 818-600-5515
6 Fax: 866-401-1457
7 david@pricelawgroup.com

8 [Additional counsel appearing on signature page]

9 *Attorneys for Plaintiff* NICK FISHER
10 and the Classes

11 **IN THE UNITED STATES DISTRICT COURT**
12 **FOR THE DISTRICT OF ARIZONA**

13 NICK FISHER, individually and on behalf of
14 all others similarly situated,

15 Plaintiff,

Case No. 2:18-cv-00309-JZR

16 v.

17 ONE WAY FUNDING, LLC, a New York
18 limited liability company,

19 Defendant.

20 **PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT**

21 Plaintiff Nick Fisher ("Fisher" or "Plaintiff"), pursuant to Federal Rule of Civil Procedure
22 55(a), hereby moves to have this Court enter default against Defendant One Way Funding, LLC.
23 Entry of Default is proposed against Defendant because they have failed to answer or otherwise
24 respond to Fisher's Complaint. One Way Funding, LLC was served on February 28, 2018 but
25 have failed to respond.

26 This request is further supported by the Affidavit of Default, attached hereto as Exhibit A.

Respectfully submitted,

Dated: April 5, 2018

NICK FISHER, individually and on behalf of all
others similarly situated,

By: s/ Patrick H. Peluso
One of Plaintiff's Attorneys

David Chami
Price Law Group, P.C.
1204 E. Baseline Rd., Suite 102
Tempe, Arizona 85283
Tel: 866-881-2133
Fax: 866-401-1457
david@pricelawgroup.com

Steven L. Woodrow*
swoodrow@woodrowpeluso.com
Patrick H. Peluso*
ppeluso@woodrowpeluso.com
Woodrow & Peluso, LLC
3900 East Mexico Ave., Suite 300
Denver, Colorado 80210
Telephone: (720) 213-0675
Facsimile: (303) 927-0809

Attorneys for Plaintiff and the Classes

* *Pro Hac Vice*

CERTIFICATE OF SERVICE

The undersigned, Patrick H. Peluso, hereby certifies that a true and correct copy of Plaintiff's Request for Entry of Default Judgment was served upon Defendant by causing such papers to be sent via Certified United States Mail to Defendant's principal place of business, attention General Counsel.

/s/ Patrick H. Peluso